

# Exhibit 2

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, JANE HAMILTON )  
SERGIO DELEON, FLOYD J. )  
CARRIER, ANNA BURNS, )  
MICHAEL MONTEZ, PENNY POPE, )  
OSCAR ORTIZ, KODY OZIAS, )  
JOHN MELLOR-CRUMLEY, PEGGY )  
HERMAN, EVELYN BRICKNER, )  
GORDON BENJAMIN, KEN GANDY, )  
LEAGUE OF UNITED LATIN )  
AMERICAN CITIZENS (LULAC), ) CIVIL ACTION NO.  
AND DALLAS COUNTY, TEXAS, ) 2:13-CV-193 (NGR)  
Plaintiffs, ) [Lead case]  
)  
V. )  
)  
RICK PERRY, Governor of )  
Texas; and JOHN STEEN, )  
Texas Secretary of State, )  
Defendants. )

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UNITED STATES OF AMERICA, )  
Plaintiffs, )  
)  
TEXAS LEAGUE OF YOUNG )  
VOTERS EDUCATION FUND, )  
IMANI CLARK, AND MICHELLE )  
BESSIONE, )  
Plaintiff-Intervenors, )  
)  
TEXAS ASSOCIATION OF )  
HISPANIC COUNTY JUDGES AND )  
COUNTY COMMISSIONERS, )  
HIDALGO COUNTY, AND MARIA ) CIVIL ACTION NO.  
LONGORIA BENAVIDES, ) 2:13-CV-263 (NGR)  
Plaintiff-Intervenors, ) [Consolidated case]  
)  
V. )  
)  
STATE OF TEXAS, JOHN STEEN, )  
in his official capacity as )  
Texas Secretary of State; )  
And STEVE McCRAW, in his )  
Official capacity as )  
Director of the Texas )

14

1 Texas?  
2 A I think so, yes.  
3 Q Do you have a voter registration card?  
4 A Yes, ma'am.  
5 Q Did you provide that to your attorneys?  
6 MS. VAN DALEN: Again, I'm not sure that  
7 that's an appropriate question whether she provided  
8 documents to her attorney. You can ask if she has it.  
9 MS. WOLF: Okay. Well, to the extent it  
10 was not produced, I guess we'll ask for its production;  
11 but I'll deal with that.  
12 MS. VAN DALEN: I can get documents from  
13 my client and determine whether to produce them or not.  
14 MS. WOLF: Okay.  
15 Q (By Ms. Wolf) And is the [REDACTED]  
16 address, is that where you're registered to vote?  
17 A Yes, ma'am.  
18 Q And have you ever been registered to vote at  
19 another address?  
20 A No, ma'am.  
21 Q So were you not registered to vote prior to  
22 1970?  
23 A I don't remember.  
24 Q Do you know when you registered to vote?  
25 A No, ma'am.

16

1 A Yeah.  
2 Q And where did you work as a provider?  
3 A Here in the Willacy County.  
4 Q Was there one building or location or did you  
5 move around the county?  
6 A No, I moved. Yes.  
7 Q And how did you get from worksite to worksite?  
8 A I would drive.  
9 Q And prior to 2000, did you have any other  
10 employment?  
11 A No, ma'am.  
12 Q Did you do anything to prepare for your  
13 deposition today?  
14 A I just -- I was thinking that I was going to --  
15 what I was going to say and --  
16 Q Did you meet -- I'm sorry. Go ahead. I didn't  
17 mean to interrupt you.  
18 A And my lawyer told me what I was -- I was --  
19 MS. VAN DALEN: I'm going to advise you  
20 not to say anything that I told you or you told me,  
21 please.  
22 Q (By Ms. Wolf) And to clarify, I don't want to  
23 -- I'm not asking for that information either. I just  
24 -- maybe we'll -- let's break it down. Did you meet  
25 with Ms. van Dalen? And that's a yes or a no answer.

15

1 Q Have you ever used a post office box as your  
2 mailing address?  
3 A No, ma'am.  
4 Q And where did you attend school?  
5 A In Sullivan City.  
6 Q Do you have any school records from when you  
7 attended school?  
8 A No, ma'am.  
9 Q Do you have any transcripts or --  
10 A No, nothing.  
11 Q And what level of education did you complete?  
12 A Sixth grade.  
13 Q And are you currently employed?  
14 A No, ma'am.  
15 Q Have you ever been --  
16 A I'm disabled.  
17 Q Sorry. Okay. Have you ever been employed?  
18 A Yes. I worked as a provider since 2000 -- I  
19 started in 2000 until 2005.  
20 Q And when you say provider, do you mean  
21 childcare provider?  
22 A Adult.  
23 Q Adult provider?  
24 A Yes.  
25 Q Adult care.

17

1 MS. VAN DALEN: That's me.  
2 Q (By Ms. Wolf) Sorry. With Marinda. Do you  
3 know approximately for how long you met with her?  
4 A For about 30 minutes.  
5 Q And did you only meet with her one time in  
6 preparation for this deposition?  
7 A About two, two or three times.  
8 Q And do you know when those other two meetings  
9 were?  
10 MS. VAN DALEN: And, again, I'm going to  
11 ask you what relevance or how this is potentially going  
12 to lead to relevant evidence, please?  
13 MS. WOLF: Well, I think I'm entitled to  
14 probe deposition preparation. I'm not going to ask her  
15 what you said to her and what she said to you, but I  
16 think it's pretty standard to ask what she did to  
17 prepare.  
18 MS. VAN DALEN: Okay. I fail to see the  
19 relevance or how it's going to lead to admissible  
20 evidence.  
21 Q (By Ms. Wolf) You can answer the question. I  
22 think it was just if you know when those other two to  
23 three meetings occurred?  
24 A When?  
25 Q Um-hum.